

US EPA RECORDS CENTER REGION 5



463962

REPORT ON INSPECTION TO DETERMINE
COMPLIANCE WITH THE STORAGE AND DISPOSAL
OF TETRACHLORODIBENZO-P-DIOXIN REGULATIONS

HYSAN CORPORATION
3000 W. 139TH STREET
BLUE ISLAND, ILLINOIS 60406

SEPTEMBER 15, 1982

Performed by:

U.S. ENVIRONMENTAL PROTECTION AGENCY
TOXIC MATERIALS BRANCH
230 SOUTH DEARBORN STREET
CHICAGO, ILLINOIS 60604

REFERENCE EPA FILES
SITE NAME ~~Blue Island~~ Hysan
SITE ID 05-1L-0208

TCDD COMPLIANCE INSPECTION REPORT

I. COMPANY IDENTIFICATION

Hysan Corporation
3000 W. 139th Street
Blue Island, Illinois 60406

RESPONSIBLE OFFICIAL

Mr. Leonard L. Mednick, President

II. DATE OF INSPECTION

September 15, 1982

III. PARTICIPANTS

Company

Mr. Joe Grahonya, Plant Manager
Mr. Tom Sultan, Laboratory Supervisor

U.S. EPA, Region V

Mr. Paul Meriage, Chemical Engineer (Author), 5HT-TUB

IV. OBJECTIVES

The inspection was conducted to document the manufacturer's storage and disposal practices and to determine its compliance with the TCDD Storage and Disposal Regulations, 40 CFR Part 775, as published in the Federal Register of May 19, 1980.

The inspection was conducted on the basis of our Agency's printout records listing the manufacturer as having processed hexachlorophene, a pesticide derivative of 2,4,5-trichlorophenol.

V. COMPANY BACKGROUND

The facility that employs 65 workers is a formulator and packager of aerosol cleaner products. The annual gross sales for the Hysan Corporation is approximately \$21 million.

VI. INSPECTION SUMMARY

On meeting with Mr. Grahonya, the inspector presented his U.S. EPA credentials; a Notice of Inspection and the TSCA Confidentiality Notice.

REFERENCE EPA FILES
SITE NAME Ventron
SITE ID OS-IL-0211

The inspector explained that the regulations apply to wastes generated in the manufacturing or processing of 2,4,5-trichlorophenol or its pesticide derivatives. The regulations also apply to wastes generated in manufacturing processes using equipment that at some time was used in the manufacturing of 2,4,5-trichlorophenol or its pesticide derivatives.

Mr. Grahonya informed the inspector that the hexachlorophene used in processing was all purchased, none was manufactured by Hysan. Their plant uses approximately 20 pounds of hexachlorophene per year in two product formulations having an approximate 0.25% hexachlorophene content (2.5 pounds per 1,000 pound batch).

The Silvex that was also processed previously was also purchased, none was manufactured by Hysan. No other derivatives of 2,4,5-trichlorophenol have been processed or manufactured by Hysan.

No "TCDD wastes for disposal" have been generated in processing Silvex and hexachlorophene.

In his November 1, 1982, letter (Appendix A) to Mr. Karl E. Bremer, Mr. Edward S. Berger, Vice President and General Counsel for Hysan Corporation, affirmed that Hysan has never manufactured any derivatives of 2,4,5-trichlorophenol and has never generated any wastes in processing hexachlorophene.

VII. FINDINGS AND CONCLUSIONS

On basis of the information gathered, it appears that the manufacturer is compliant with the TCDD disposal regulations.

REFERENCE EPA FILES
SITE NAME Vention
SITE ID DS-1L-0211



919 W. 38TH ST., CHICAGO, ILLINOIS 60609 AREA CODE 312 376-8900

November 1, 1982

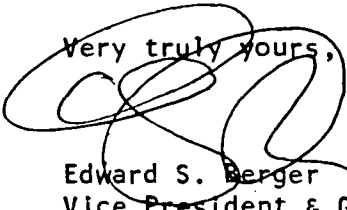
Mr. Karl E. Bremer
Chief - Toxic Substances Section
U.S. EPA - Region V
230 South Dearborn St.
Chicago, IL 60604
ATTN: 5HT-TUB

Dear Mr. Bremer:

In response to your letter of October 19, 1982, please be informed that Hysan Corporation does not manufacture or process any of the products listed under Paragraph 1. of your letter. The 2,4,5,-trichlorophenol or its pesticide derivatives are not used by Hysan and have not been for many years with the exception of hexachlorophene. In the case of hexachlorophene, there is no manufacture or processing of this product, it simply arrives in our plant as part of a pre-mixed concentrate which is then incorporated one hundred percent (100%) into finished products. With respect to the storage and/or disposal of wastes generated in manufacturing processes referred to in Paragraph 2. of your letter, please be informed that Hysan generates no waste of this kind because Hysan does not use any equipment in the manufacturing of 2,4,5-trichlorophenol or any of its pesticide derivatives.

I trust the above information will be of value to you in resolving the question raised under the Toxic Substance Control Act (TSCA). Please let me know if any additional information or documentation is required.

Very truly yours,



Edward S. Berger
Vice President & General Counsel

ESB:lh

cc: Bernard Berkeley
John Osborn
Leonard Mednick

REFERENCE EPA FILES
SITE NAME Ventron
SITE ID 05-1L-0211



United States
Environmental Protection
Agency

NOTICE OF INSPECTION

Inspector Name and Address *Paul Meriage*
U.S. EPA
230 S. Dearborn St.
Chicago, Illinois 60604

Inspector's Signature

Paul Meriage

Title

Chemical Engineer

Name of Firm

Hysan Corporation

Firm Address

3000 W. 139th St.
Blue Island, Illinois 60406

Date

Time

Name and Title of Recipient

Paul Meriage

Signature of Recipient

[Signature]

REASON FOR INSPECTION

Storage and Disposal of Wastes Containing TCDD

Under the authority of Section 11 of the Toxic Substances Control Act



For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been compiled with.



In addition, this inspection extends to (circle appropriate letters):

(A) Financial data

(D) Personnel data

(B) Sales data

(E) Reserach data

(C) Pricing data

The nature and extent of inspection of such data specified in A through E above as follows:

REFERENCE *EPA FILES*

SITE NAME *Ventron*

SITE ID *05-IL-0211*



United States
Environmental Protection
Agency

TSCA INSPECTION CONFIDENTIALITY NOTICE

Inspector Name

Paul Meriage

Inspector Address

U.S. EPA
230 S. Dearborn St.
Chicago, Illinois 60604

Name of Individual to Whom Notice Given

Facility

Hysan Corporation

Facility Address

3000 W. 139th St.
Blue Island, Illinois 60406

Chief Executive Officer of Firm

Title

Title

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552, EPA regulations issued thereunder, 40 CFR Part 2, and the Toxic Substances Control Act, Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by means of the procedures, set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To Claim Confidential Information

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).

3. The information is not publicly available elsewhere.

4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential and meets the four criteria listed above.

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within two days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

PAUL MERIAGE
DOCUMENT CONTROL OFFICER (SHT-TUE)
U.S. EPA
230 S. DEARBORN ST.
CHICAGO, IL 60604

and mailed by registered, return-receipt-requested mail within seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Chief Executive Officer within the seven-day period, will be treated by EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by facility official receiving this notice

I have received and read this Notice.

Name

Title

Signature

Date

Name

Title

Address

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

REFERENCE EPA FILES

SITE NAME

Ventron

SITE ID

05-1L-0211



United States
Environmental Protection
Agency

RECEIPT FOR
SAMPLES AND DOCUMENTS

Inspector Name

Paul Meriage

Inspector Address

U.S. EPA
230 S. Dearborn St.
Chicago, Illinois 60604

Name of Firm

Hysan Corporation

Firm Address

3000 W. 139th St.
Blue Island, Illinois 60406

Name of Individual

JOE GRAHONYA

Title

PLANT MANAGER

Date Collected

Duplicate Samples Requested and Received

() Yes () No

Sample Numbers

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt for the document(s) and/or sample(s) described is hereby acknowledged:

5/26/82 copy of letter from SL EPA to determine compliance under RCRA

4/3/82 copy of letter to SL EPA relative to the exemption under RCRA

5/7/82 copy of letter from SL EPA re: compliance with RCRA

5/14/82 copy of letter to SL EPA re: exemption under RCRA

Signature of Inspector

Paul Meriage

Title

chemical engineer

Signature of Owner, Operator, or Agent

Joe Grahonya

Title

Plant Manager

REFERENCE EPA FILES

SITE NAME Ventron

SITE ID 05-IL-0211